



MURIEL GOODE-TRUFANT  
*Acting Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

Marina Moraru  
*Special Assistant Corporation Counsel*  
Office: 212) 356-2456

October 16, 2024

**VIA ECF**

Hon. John G. Koeltl  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *A.S., et al. v. New York City Dep't of Educ.*, 24-cv-2104 (JGK)(KHP)

Dear Judge Koeltl:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek attorneys' fees, costs and expenses for legal work on administrative hearings under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write on behalf of both parties to respectfully request a 45-day stay of this action, from November 25, 2024 until January 9, 2025. This is the second request for a stay: on August 23, 2024, the Court granted Defendant's first request for a 90-day stay until November 25, 2024 (ECF 11). Previously, on July 10, 2024, the Court granted Defendant's first request for an extension. (ECF 8). Plaintiffs provided their demand and supporting documents on October 15, 2024. This is an IDEA fees-only case and liability appears not to be at issue. Now that Plaintiffs provided the needed billing records, Defendant will proceed with its internal settlement review, which includes review of the underlying administrative record together with the relevant billing records and thereafter present a reasonable early offer of settlement. We have resolved recent similar IDEA fees-only cases brought by Plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice or conferences. The parties are hopeful this matter will be resolved as well.

We also respectfully propose that, if a stay is granted, the parties be required to submit a joint status letter regarding settlement negotiations on or before January 9, 2025.

Thank you for considering these requests.

Respectfully submitted,  
*/s/ Marina Moraru*

Marina Moraru, Esq.  
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)

**APPLICATION GRANTED  
SO ORDERED**

10/17/24 *John G. Koeltl*  
John G. Koeltl, U.S.D.J.